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- c) On the other side of the load balancer, there is a local network (lines 13-14), which is connected to a plurality of "network nodes" (lines 29-30).
- d) The network nodes contain "web servers" (line 34).
- e) The nodes (i.e., the web servers) contain portions of "all the resources" of the web site (line 39), but the resources "are not mirrored" to all of the network nodes (i.e. web servers). Line 39-41.
- f) All requests come in through the balancer, but the responses to the requests go out on the network directly (lines 31-33).

Focusing on the Brendel et al teachings relative to the subject claims, it is clear that Brendel et al teach a load balancer that is dedicated to a single web site that is composed of a number of web servers. Stated differently, Brendel et al teach going to one of a number of like elements that, as a group, define the web site. Stated still differently, the web servers of Brendel et al are NOT cache servers in the sense employed in the subject claims because they are merely components of the web site itself. Moreover, this load balances forwards all requests to some web server. On its own, it does not satisfy any requests.

In contradistinction, amended claim 25 defines a cache selection module that decides whether "an attempt to service said request should be made" for a cache server "belonging to a set that includes said cache server of said module." In other words the selection module is different from the load balancer of Brendel et al in that it can select itself as the cache server to go to for information.

Similarly, claim 25 defines a method where a virtual cache that is made up of an interconnected plurality of cache servers. The method of claim 25 further defines a step of converting said address destination to a designation that identifies a cache server in said virtual cache. There is no limitation of what cache server to which the address can be mapped, so the step can clearly designate itself as the "cache server in said virtual cache" to which a request for information is directed. Claim 28 contains a similar limitation, in that the cache server belongs to the virtual cache, and one of the cache servers is assigned the task of caching information. There is no limitation in the claim that, somehow, excludes a cache from the virtual cache for some purpose or another.

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As amended, the claims specify that the cache selection module in each of the cache servers can service multiple web sites. In contrast, Brendel et al teaches the use of a load balancer that can only service a single web site (column 6, lines 33-40, and preamble of claim 1). Furthermore, in column 9, lines 22-26 and figure 6, Brendel et al teach that the load balancer is identified by a virtual IP address which identifies *all* servers at the web site, thus making it impossible for a single load balancer to service more than one web site.

Further, Brendel et al fail to teach the step of routing the request to the web site server (servers outside the cache arrangement) as claimed in claims 1 and 28. Brendel et al teaches a load balancer that is responsible for directing data traffic between client browsers requesting information and web site servers containing the requested information (figures 6 and 8). In contrast, the present invention as disclosed and claimed teaches the use of an arrangement of multiple *cache* servers, each of which being able to direct data traffic between the client browser requesting information and any of the cache servers in the arrangement as long as any one of the cache servers currently caches the information requested. If it is determined that the requested information is not cached by any of the cache servers, the request is directed to *the site or sub-site address* containing the information, which is *outside the arrangement* of cache servers. Brendel et al cannot possibly teach such a limitation, since the load balancer disclosed in Brendel et al interacts directly with the web servers, and only with the web servers.

Still further, Brendel et al fails to teach the step of *assigning one of the cache servers to cache the information* as claimed in claim 28. As stated above, the Load Balancer taught by Brendel et al interacts directly with the web servers themselves. Brendel et al neither teaches nor suggests the use of cache servers let alone the assignment of a cache server to cache information.

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In light of the above amendments and remarks, it is respectfully submitted that claims 1, 25 & 28 and all of their dependent claims are patentably distinguished over Brendel et al and the allowance of the claims is hereby requested.

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Respectfully,
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By


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